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Industrial Minerals Association - North America

July 16, 2004

Dr. C. W. Jameson  
National Toxicology Program  
Report on Carcinogens  
Bldg. 4401, Rm. 3118  
79 T. W. Alexander Drive  
P.O. Box 12233  
Research Triangle Park, NC 27709

**Re: Comments on the talc nominations for the Twelfth Report on Carcinogens (RoC)**

Dear Dr. Jameson:

The Industrial Minerals Association-North America (IMA-NA) is a trade association established in 2002 to represent North American companies that mine or process industrial minerals used throughout the manufacturing and agricultural industries. IMA-NA currently represents the leading producers of eight industrial minerals, including talc.

We wish to take this opportunity to protest the talc nomination concerning "occupational exposure to talc." The National Institute of Environmental Health Sciences' basis for nomination, published in the May 19, 2004 *Federal Register*,<sup>1</sup> cites:

*"Human epidemiological studies reporting an increase [sic] risk of cancer among workers exposed to talc."*

As recognized by the NTP in the Background Document for Talc prepared in connection with the Tenth RoC review, this statement clearly is not supported by the scientific evidence.

The Background Document explicitly concluded:

*"In the light of these findings, the evidence from studies of occupational exposure to non-asbestos-containing talc is not sufficient to support a conclusion that this form of talc is carcinogenic."*<sup>2</sup>

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<sup>1</sup> 69 FR 28940, 28944.

<sup>2</sup> at 29.

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*"The current data indicate that inhaled non-asbestiform talc is unlikely to pose a cancer risk to humans under exposure conditions that do not impair clearance mechanisms or cause chronic lung toxicity."*<sup>3</sup>

These conclusions have been reinforced by results reported in two recently published studies by Wild *et al.* (2002)<sup>4</sup> and Coggiola *et al.* (2003).<sup>5</sup> These studies of French, Austrian, and Italian talc workers constitute the largest study group exposed to talc not containing asbestos and the largest data record base in the world. The analyses confirmed that there was no significant excess of lung cancer or excess of any other type of cancer among these populations.

IMA-NA firmly believes that this (re) nomination of talc with respect to "occupational exposure" is unsupportable and unwarranted. Unfounded health and safety concerns among workers at facilities processing or using talc already have begun to resurface due to the announcement of this talc nomination and, thus, we believe the National Toxicology Program has both the duty and obligation to retract the nomination swiftly to resolve this misapprehension. We respectfully assert that this nomination is unsupportable and must be withdrawn.

Sincerely,



Mark G. Ellis  
President

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<sup>3</sup> at 71-72.

<sup>4</sup> Wild P, Leodolter K, Réfrégier M, Schmidt H, Zidek T, Haidinger G. 2002. A cohort mortality and nested case-control study of French and Austrian talc workers. *Occup Environ Med* 59:0-7

<sup>5</sup> Coggiola M, Bosio D, Pira E, Piolatto PG, La Vecchia C, Negri E, Michelazzi M, Bacaloni A. 2003. An Update of a mortality study of talc miners and millers in Italy. *Am J Ind Med*; 44 (1) 63-9.